

# EXHIBIT D

**From:** Waqas Anis <wanis@idsinc.com>

**Sent:** Monday, April 4, 2022 1:31 PM

**To:** Kazim Naqvi <KNaqvi@sheppardmullin.com>; Jim Vaughn <JVaughn@idsinc.com>; Miller, Rory <Rory.Miller@lockelord.com>

**Cc:** Rena Andoh <RAndoh@sheppardmullin.com>; Goeke, Justine <JGoeke@gibsondunn.com>; James Fazio <JFazio@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Popham, Mitchell <MPopham@lockelord.com>; Froehlich, Joseph <JFroehlich@lockelord.com>; Dominguez, Kate <KDominguez@gibsondunn.com>; Polka, Michael M. <MPolka@gibsondunn.com>; Townsend Bourne <tbourne@sheppardmullin.com>; Samplin, Ilissa <ISamplin@gibsondunn.com>

**Subject:** RE: Moog v. Skyrise- Call re iDiscovery engagement and device protocol

Kazim,

We received two boxes and the following devices were identified in each box:

**Alin Pilkington's box**

1. Western Digital External HD, SN: WX21DBBP7C8E
2. Buffalo External HD SSD, SN: 40608110534064
3. Buffalo External HD SSD, SN: 40608120102352
4. iPad A1459, SN:DMPJL0TCF18C
5. iPhone XS
6. iPad A1652, SN: DLXR3L7PGMW3
7. Western Digital External HD, SN: WXU2EA00YVMN
8. Western Digital External HD, SN: WXV2EA0FNHWW
9. Samsung Portable SSD, SN:S5SXNS0R700159M
10. MacBook Pro A19990, SN: C02XG6PHJH6
11. Blue 1 TB usb flash drive
12. SanDisk Cruzer 64 GB

**Misook Kim's box**

1. iPhone 13 or 12
2. Adata usb flash drive
3. Verbatim usb flash drive
4. SanDisk Cruzer 8 GB
5. Memorex 16 GB
6. Microsoft Surface Model 1645, SN: 070961552052
7. LG Gram Model: 169T0P, SN: 11OQCWC563905
8. iPad A1584, SN: DLXQTE2FMLL
9. MacBook Pro A1502, SN: C02P702TFVH9
10. KIA usb flash drive
11. Blue/Silver External HD

Thanks,



**Waqas Anis**

**Digital Forensics Jr. Consultant**

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**From:** Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>

**Sent:** Monday, April 4, 2022 12:44 PM

**To:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>; Miller, Rory <[Rory.Miller@lockelord.com](mailto:Rory.Miller@lockelord.com)>

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Goeke, Justine <[JGoeke@gibsondunn.com](mailto:JGoeke@gibsondunn.com)>; Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>; James Fazio <[JFazio@sheppardmullin.com](mailto:JFazio@sheppardmullin.com)>; Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Popham, Mitchell <[MPopham@lockelord.com](mailto:MPopham@lockelord.com)>; Froehlich, Joseph <[JFroehlich@lockelord.com](mailto:JFroehlich@lockelord.com)>; Dominguez, Kate <[KDominguez@gibsondunn.com](mailto:KDominguez@gibsondunn.com)>; Polka, Michael M. <[MPolka@gibsondunn.com](mailto:MPolka@gibsondunn.com)>; Townsend Bourne <[tbourne@sheppardmullin.com](mailto:tbourne@sheppardmullin.com)>; Samplin, Ilissa <[ISamplin@gibsondunn.com](mailto:ISamplin@gibsondunn.com)>

**Subject:** RE: Moog v. Skyryse- Call re iDiscovery engagement and device protocol

[EXTERNAL SENDER]

Jim—

We wanted to follow up on an identifying list of the devices turned over by the Individual Defendants on Friday.

Thanks,  
Kazim

**Kazim Naqvi**  
**SheppardMullin** | Los Angeles  
+1 424-288-5336 | ext. 15336

**From:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>

**Sent:** Friday, April 1, 2022 6:30 PM

**To:** Miller, Rory <[Rory.Miller@lockelord.com](mailto:Rory.Miller@lockelord.com)>; Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>

**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Goeke, Justine <[JGoeke@gibsondunn.com](mailto:JGoeke@gibsondunn.com)>; Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>; James Fazio <[JFazio@sheppardmullin.com](mailto:JFazio@sheppardmullin.com)>; Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Popham, Mitchell <[MPopham@lockelord.com](mailto:MPopham@lockelord.com)>; Froehlich, Joseph <[JFroehlich@lockelord.com](mailto:JFroehlich@lockelord.com)>; Dominguez, Kate <[KDominguez@gibsondunn.com](mailto:KDominguez@gibsondunn.com)>; Polka, Michael M. <[MPolka@gibsondunn.com](mailto:MPolka@gibsondunn.com)>; Townsend Bourne <[tbourne@sheppardmullin.com](mailto:tbourne@sheppardmullin.com)>; Samplin, Ilissa <[ISamplin@gibsondunn.com](mailto:ISamplin@gibsondunn.com)>

**Subject:** Re: Moog v. Skyryse- Call re iDiscovery engagement and device protocol

We will be providing a list, but not today.

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Jim Vaughn, GCFE, EnCE

Managing Director  
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**From:** Miller, Rory <[Rory.Miller@lockelord.com](mailto:Rory.Miller@lockelord.com)>  
**Sent:** Friday, April 1, 2022 6:23 PM  
**To:** Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>  
**Cc:** Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)>; Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Goeke, Justine <[JGoeke@gibsondunn.com](mailto:JGoeke@gibsondunn.com)>; Waqas Anis <[wanis@idsinc.com](mailto:wanis@idsinc.com)>; James Fazio <[JFazio@sheppardmullin.com](mailto:JFazio@sheppardmullin.com)>; Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Popham, Mitchell <[MPopham@lockelord.com](mailto:MPopham@lockelord.com)>; Froehlich, Joseph <[JFroehlich@lockelord.com](mailto:JFroehlich@lockelord.com)>; Dominguez, Kate <[KDominguez@gibsondunn.com](mailto:KDominguez@gibsondunn.com)>; Polka, Michael M. <[MPolka@gibsondunn.com](mailto:MPolka@gibsondunn.com)>; Townsend Bourne <[tbourne@sheppardmullin.com](mailto:tbourne@sheppardmullin.com)>; Samplin, Ilissa <[ISamplin@gibsondunn.com](mailto:ISamplin@gibsondunn.com)>  
**Subject:** Re: Moog v. Skyrise- Call re iDiscovery engagement and device protocol

[EXTERNAL SENDER]

Why doesn't iDS prepare a list? Alternatively, if the concern is whether devices were lost in transmittal to iDS I will communicate with Jim separately.

On Apr 1, 2022, at 6:09 PM, Kazim Naqvi <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)> wrote:

**\*\* External Email -- Sender: [knaqvi@sheppardmullin.com](mailto:knaqvi@sheppardmullin.com) \*\***

Rory—

Pursuant to Jim's request and as provided by Skyrise earlier, can counsel for the individual defendants provide a list with specifications of the devices turned over to iDS today? This will ensure that all parties are clear and on the same page regarding the number and type of devices that have been turned over and in the custody of iDS.

Thank you,  
Kazim

On Apr 1, 2022, at 5:20 PM, Miller, Rory <[Rory.Miller@lockelord.com](mailto:Rory.Miller@lockelord.com)> wrote:

That should be the individual defendants' materials yes.

On Apr 1, 2022, at 5:06 PM, Jim Vaughn <[JVaughn@idsinc.com](mailto:JVaughn@idsinc.com)> wrote:

**\*\* External Email -- Sender: [JVaughn@idsinc.com](mailto:JVaughn@idsinc.com) \*\***

Hello All. After Waqas had left the office, he received a call from a courier who was attempting to make another delivery. This of course was unknown to us. He drove back to the office and was told there are a couple boxes. Can someone please tell us if this is computers and devices for the individual defendants, and if so, what is it that we should have gotten?

Thank you

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**Jim Vaughn, GCFE, EnCE**

***Managing Director***

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